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*Co-Counsel to Front Range–Midway Solar Project, LLC*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

Powin, LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No.: 25-16137 (MBK)

(Jointly Administered)

**APPLICATION FOR *PRO HAC VICE* ADMISSION  
OF GARY M. KAPLAN**

Joseph L. Schwartz (the “Movant”), a member in good standing of the Bar of the State of New Jersey, an attorney admitted to practice before the United States District Court for the District of New Jersey, and a partner with the law firm Riker Danzig LLP, hereby moves the Court for an

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: (i) Powin Project LLC [1583], (ii) Powin, LLC [0504], (iii) PEOS Holdings, LLC [5476], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], and (ix) Powin Energy Operating, LLC [6487]. The Debtors’ mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

order permitting Gary M. Kaplan, an attorney with the law firm Farella Braun + Martel LLP (the “Applicant”), counsel to Front Range–Midway Solar Project, LLC (“FRMSP”), to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent FRMSP pursuant to District of New Jersey Local Civil Rule 101.1 and Local Bankruptcy Rule 9010-1 in the above-captioned bankruptcy cases (the “Bankruptcy Cases”). In support of the relief requested herein, the Movant states as follows:

### **JURISDICTION**

1. This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

### **RELIEF REQUESTED**

2. By this Application, the Movant requests entry of an Order admitting the Applicant on a *pro hac vice* basis. The good standing of the Applicant is set forth in the Applicant’s certification, which accompanies this Application (the “Certification”).

3. The Applicant is an attorney at Farella Braun + Martel LLP, with an office located at One Bush Street, Suite 900, San Francisco, CA 94104. As the Certification demonstrates, the Applicant is a member in good standing of the Bar of the highest court in which he is admitted and in the federal courts set forth in the Certification.

4. It is anticipated that the Applicant will be active in the representation of FRMSP in the Bankruptcy Cases. Accordingly, the Movant respectfully requests that the Court grant the *pro hac vice* admission of the Applicant and that he be permitted to appear on FRMSP’s behalf in connection with the Bankruptcy Cases.

5. No previous application for the relief sought herein has been made to this or any other court in connection with these proceedings.

**WAIVER OF MEMORANDUM OF LAW**

6. Pursuant to D.N.J. LBR 9013-1, the Movant respectfully requests that the Court waive the requirement that it file a memorandum of law in support of this Application because no novel issues of law are presented herein.

**CONCLUSION**

WHEREFORE, for all of the foregoing reasons, the Movant respectfully requests that the Court enter an Order, substantially in the form filed herewith, permitting the Applicant to appear *pro hac vice* in association with the Movant as counsel to FRMSP, and granting such other and further relief as is just.

July 25, 2025  
Madison, New Jersey

**RIKER DANZIG LLP**

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